Mar-14-02 1:53PM;

MICHAEL J. PAUKERT
WILLIAM J. SCHROEDER
PAINE, HAMBLEN, COFFIN,
BROOKE & MILLER LLP
717 West Spraguc Avenue, Suite 1200
Spokane, Washington 99201-3505
Telephone: (509) 455-6000
Facsimile: (509) 838-0007
Attorneys for Certain Creditor/Beneficiaries

of the Estate of Christina Leaf

U.S. COURTS

02 MAR 14 PM 4: 23

NECTO FILTO FORKE DANG CLERK IDAHO

FAX FILED

IN THE UNITED STATES BANKRUPTCY COURT DISTRICT OF IDAHO

In Re:)) No. 02-20218
FRANK and SYDNEY CHAPIN)) OBJECTION TO THE EMPLOYMENT
Debtors.) OF LEWIS WILSON AS SPECIAL) COUNSEL FOR DEBTORS
<u></u>	_5

COME NOW, unsecured creditors of debtors Frank and Sydney Chapin; Jerilyn A. Klungtvedt, John C. Wagner, Daniel Wagner, Lynctte J. Brekke, Karen Saxowsky, Donald Wagner, American Lutheran Church, Jerilyn Bierema and Linda Wagner; and file this Objection to the Employment of Lewis Wilson, attorney at law, 1519 West Broadway, Spokane, Washington 99201.

Pursuant to LBR 2002-2(c), the unsecured creditors object to the employment of Mr. Wilson as an attorney for the debtors on the grounds that Mr. Wilson's legal fees and costs are secured claims in this bankruptcy proceeding by virtue of a deed of trust executed in favor of Mr. Wilson by debtors Frank L. Chapin and Sydney G. Chapin. The deed of trust is recorded on the real property legally identified as 55N04W199550A, in Bonner County, Idaho. A true and accurate copy of the deed of trust is attached hereto as Exhibit A.

Sent By: PAINE HAMBLEN NORTH;

DATED this 14 day of March, 2002.

PAINE, HAMBLEN, COFFIN, BROOKE & MILLER LLP

Michael J. Paukert, dano Bar #4327 William J. Schroeder, Pro Hac Vice Attorneys for Creditors American Luthcran Church, Jerilyn A. Klungtvedt, John C. Wagner, Daniel C. Wagner, Lynotto J. Brekke, Karen Saxowsky, Donald Wagner, Linda Wagner and Jerilyn Bierema

Mar-1<u>4-</u>02 1:54PM;

CERTIFICATE OF SERVICE

I hereby certify that on the <u>///</u>day of March, 2002, a true and correct copy of the foregoing was duly served on all parties entitled to service by the method listed below, addressed to the following:

HAND DELIVERY
OVERNIGHT MAIL
U.S. MAIL
VIA FACSIMILE

HAND DELIVERY
OVERNIGHT MAIL
U.S. MAIL
VIA FACSIMILE

U.S. Trustee P.O. Box 110 Boise, ID 83701

See Attached Mailing Matrix

00023026.WPD:kc-jah

gg/g7/g**00**0 15:50 008

0087654700

HINDS VASSEUM

GEED OF TRUST

THIS DEED OF TRUST, made this _____ day of February, 2002 BETWEEN FRANK & SYDNEY CHAPIN, herein called GRANTORS, whose address in 2872 Hoodoo Mountain Road Priest River, Idaho 83864, and FIRST AMERICAN TITLE COMPANY, as Idaho Corporation, berein called TRUSTEE, whose address is 200 Main Street, Sandpoint, Idaho 83864, and LEWIS WILSON, herein called BENEFICIARY, whose address is 1519 W Broadway Avenue. Spokane, Washington 99201.

WITNESSETH: That Grantors do bereby irrevocably GRANT, BARGAIN, SELL AND CONVEY TO TRUSTEE IN TRUST, WITH POWER OF SALE, that property in the County of Bonner, State of Idaho, described as follows, either located within an incorporated city or village at the date bereof, or containing not more than forty acres.

THAT PORTION OF THE E1/1, E1/2, SE1/4 OF SECTION 19, TOWNSHIP 55 NORTH, RANGE 4 WEST, BOISE MERIDIAN, BONNER COUNTY, IDAHO, LYING SOUTH OF THE COUNTY ROAD.

TOGETHER WITH the rents, issues, and profits thereof. This deed of trust is executed by GRANTORS for the purpose of securing payment to Beneficiary of legal feet incurred, up to the amount of FIFTY THOUSAND DOLLARS AND NOV100 (\$50,000.00) and any interest thereon, and it is the express intention of the parties to this Deed of Trust that it shall stand as continuing security until said amounts are paid.

Request is hereby made that a copy of any Notice of Default and Fopy of any Notice of Sale bereunder be mailed to the GRANTORS at their address bereimbefore set forth.

FRANK CHAPIN

STUNEY CHAPIN

STATE OF IDAHO

Country of Bounse ;

SUBSCRIBED AND SWORN to before me this Z day of The Control

Noter Public for Idaho

Residing at Janeles in T

. A

192

EXHI**BIT.**

Advanced Physical Therapy 1905 Pine Street Sandpoint, ID 83864

AT&T Customer Care P.O. Box 3611 Bothell, WA 98041

Bonner General Hospital 520 N. Third Ave. Sandpoint, ID 83864

Check Rite P.O. Box 661158 Chicago, IL 60666

Discover Card P.O. Box 30395 Salt Lake City, UT 84103

Estate of Christina Leaf c/o Joseph P. Delay 601 West Main, Ste 1212 Spokane, WA 99201

First National Bank of Montana P.O. Box 1588 Libby, MT 59923

Internal Revenue Service IRS Special Procedures 550 West Fort Street Boise, ID 83724

John C. Wagner c/o William Schroeder 717 West Sprague, Ste 1200 Spokane, WA 99201

Linda Wagner c/o William Schroeder 717 West Sprague, Ste 1200 Spokane, WA 99201 American Lutheran Church c/o William Schroeder 717 West Sprague Ave., Ste 1200 Spokane, WA 99201

Bonner County Tax Collector 215 South First Ave. Sandpoint, ID 83864

Bonner Physical Therapy 1327 Superior Street Sandpoint, ID 83864

Daniel Wagner c/o William Schroeder 717 West Sprague Ave., Ste 1200 Spokane, WA 99201

Donald Wagner c/o William Schroeder 717 W. Sprague, Ste 1200 Spokane, WA 99201

Estate of Wilbur Leaf c/o Joseph Delay 601 West Main, Ste 1212 Spokane, WA 99201

Ford Motor Credit c/o Payoff Correspondence P.O. Box 543099 Omaha, NE 68154

Jay & Nancy Whitson 1923 E. Buena Vista Drive Tempe, AZ 85284

Karen Saxowsky e/o William Schroeder 717 West Sprague, Ste 1200 Spokane, WA 99201

Lynette J. Brekke c/o William Schroeder 717 West Sprague, Ste 1200 Spokane, WA 99201 American Red Cross c/o William Schroeder 717 West Sprague Ave., Ste 120-3 Spokane, WA 99201

Bonner County Treasurer 215 S. First Ave. Sandpoint, ID 83864

Capitol One P.O. Box 85015 Richmond, VA 23285

Deaconess Medical Center c/o Allen Ruben 720 West Boone, Ste 200 Spokane, WA 99201

Douglas Cipriano, MD 1327 Superior Sandpoint, ID 83864

Finney & Finney 120 Lake Street Sandpoint, ID 83864

Internal Medicine 207 Church Street Sandpoint, ID 83864

Jerilyn A. Klungtvedt c/o William Schroeder 717 West Sprague, Ste 1200 Spokane, WA 99201

Lineaire, Inc. P.O. Box 3387 Spokane, WA 99220

Providian Financial P.O. 9539 Manchester, NH 03108 Robert Kovacevich W. 818 Riverside Ave., Ste 530 Spokane, WA 99201

Selkirk Medical c/o IC Systems, Inc. 444 Hwy 96 E. St. Paul, MN 55164

U.S. Trustee P.O. Box 110 Boise, ID 83701 Robert Kovacevich, PLLC c/o Timothy Graham 1420 Fifth Ave, Ste 4100 Seattle, WA 98101

Sunrise Credit Services, Inc. 2174 Jackson Ave Seaford, NY 11783 Sears Roebuck P.O. Box 182149 Columbus, OH 43218

Toro Viejo II, Inc. 9510 Government Way Coeur d' Alene, ID 83814